



LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM

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TO: Dr. Monty Sullivan
LCTCS President

FROM: Chris Broadwater
Vice President of Workforce Policy

SUBJECT: For Board approval: Amendment of LCTCS WorkReady U Policy
#1.104, #1.105, #1.106, #1.108, #1.115, #1.119 & #1.120 and the deletion of #1.107,
#1.109.

DATE: May 27, 2019

FOR APPROVAL:

Recommendation: Staff recommends that the Board accept for approval LCTCS
WorkReady U Policy #1.104, #1.105, #1.106, #1.108, #1.115, #1.119 & #1.120 and the
deletion of #1.107, #1.109.

Background: Act 732 of the 2010 Regular Legislative Session transferred, from LDOE
to LCTCS, responsibility for the establishment, operation and maintenance of a statewide
program of adult education. Act 732 further provided that each program of adult
education shall be subject to the overall administration and supervision of the LCTCS
Board of Supervisors. Finally, Act 732 further authorizes the LCTCS Board of
Supervisors to adopt such rules and regulations as are necessary for the operations and
maintenance of effective adult education programs. The LCTCS Board of Supervisors
adopted multiple policies in 2011 regarding the administration of the adult basic
education program. However, since that time, additional testing providers have entered
the market. To ensure that LCTCS fulfills its responsibility, which includes the issuance
of diplomas and data management, the updating of the aforementioned policies ensures
that all policies reflect the current landscape of adult basic education.

History of Prior Actions: All policies were initially adopted on 2/09/2011. Policy
#1.104, 1.105, 1.106, 1.108, 1.109 and 1.115 were updated on 11/14/2012.

Fiscal Impact: N/A

Benefits to the System: The updating of the aforementioned policies will allow LCTCS
to ensure that its policies accurately reflect the current landscape of adult basic education
testing and that High School Equivalency Diplomas are issued by the appropriate legal
authority within the State of Louisiana.

Approved for Recommendation to the Board
Dr. Monty Sullivan

APPROVED

Stic 6/12/19

LCTCS BOARD OF SUPERVISORS

6-12-19

Date

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.104

Title: Placement in an Educational Functioning Level

Authority: Board Action

Original Adoption: February 9, 2011

Effective Date: February 9, 2011

Last Revision: November 14, 2012

- A. Upon administration of an approved assessment, at intake or within the first 12 hours of attendance, local programs are to place students at an educational functioning level. The Test of Adult Basic Education (TABE) Locator test is administered prior to the full assessment. Charts provided by the National Reporting System (NRS), *Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act*, shall be used for determining the appropriate Educational Functioning Level (EFL) for a student. The Educational Functioning Level chart can be found on the NRS website, <https://www.nrsweb.org/training-ta/ta-tools/assessment#Tools&Tips> *NRS Test Benchmarks for EFL*.
- B. Growth can only be shown through the administration of an approved pre-test and post-test, by receiving the state-approved high school equivalency (HSE) or by exiting Adult Education and enrolling in a post-secondary training program.
- C. Students who test into the NRS Educational Functioning Level of Advanced ESL (ESL 6), scores of 76 – 78, must be given another pre-test, as there is no exit criteria established by NRS for *BEST Literacy*. If this occurs, do the following:

Administrative Action	Pre-test Option #1	Pre-test Option #2	Pre-test Option #3
1. Do not enter into statewide data system. 2. Record pre-test attempt in student permanent record.	1. Use an oral screening tool to determine if student has low oral skills. 2. If so, administer <i>BEST Plus</i> .	Administer TABE 11/12 Reading and/or Language. <i>TABE Math is not required unless student has a math improvement goal.</i>	Administer CASAS Reading GOALS <i>CASAS Math GOALS Math is not required unless the student has a math improvement goal.</i>

- D. Students who pre- test into *BEST Plus 2.0* exit criteria (ESL Completed Advanced ESL), (scores of 565 or higher), must be given another pre-test as ESL Completed Advanced ESL, is not an NRS Educational Functioning Level. If this occurs, do the following:

Administrative Action	Pre-test Option #1	Pre-test Option #2	Pre-test Option #3
<p>1. Do not enter into statewide data system.</p> <p>2. Record pre-test attempt in student permanent record.</p>	<p>1. Use a literacy screening tool to determine if student has low literacy skills.</p> <p>2. If so, administer <i>BEST Literacy</i>.</p>	<p>Administer TABE 11/12 Reading and/or Language.</p> <p><i>TABE Math is not required unless student has a math improvement goal.</i></p>	<p>Administer CASAS Reading GOALS</p> <p><i>CASAS Math GOALS Math is not required unless the student has a math improvement goal.</i></p>

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.105

Title: POST-TEST ASSESSMENTS

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: 11/14/2012

National Reporting Systems (NRS) reporting policies state that programs use a different form of the same test for the follow-up (post-test) assessment for a student. Both the pre-test and post-test shall be administered and scored according to the test directions provided by the test publisher. *Programs shall adhere to the *Minimum Post-testing Guidelines* listed below to determine educational gain and academic progress.

Assessment	Minimum Post-testing Guidelines
<i>BEST Literacy</i>	60 hours of instruction
<i>BEST Plus</i>	60 hours of instruction
<i>Comprehensive Adult Student Assessment System (CASAS)</i>	40 hours of instruction
<i>Test of Adult Basic Education (TABE) for ABE students</i>	40 hours of instruction
<i>Test of Adult Basic Education (TABE) for ASE students</i>	30 hours of instruction ¹
<i>Test for Adult Basic Education Complete Language Assessment System-English (TABE CLAS-E)</i>	60 hours of instruction

*Providers that offer coordinated/planned instructional sessions may administer the post-test assessment at the conclusion of each instructional session, in order to support the student cohort and transition to college and career readiness. Providers must submit basic skill instructional schedule and integrated career pathway course schedule to the WRU office through the statewide data base.

Programs for Corrections Education and Other Institutionalized Individuals may post-test according to the recommended hours of instruction or after enrollment for 90 days in the instructional program.

Fifty percent (50%) of students who are federally reportable will have a pre and post-test assessment.

Students who meet the minimum post-testing guidelines for each assessment must be post-tested. Additional post-tests must follow established post-testing guidelines.

Assessments have an effective date of 180 calendar days (defined as weekdays, weekends, and holidays) from the test administration date.

Informal and Supplemental Assessment

In addition to the approved standardized assessments, programs are encouraged to use a variety of informal assessments to guide instruction. The use of teacher-made tests, unit tests, portfolios, applied performance assessments, and learner observations can be used to monitor learning and guide instruction. However, programs may only use approved **methods** to report learner *gains* for the NRS.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.106

Title: SPECIAL POPULATIONS

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: 11/14/2012

Accommodations for adult learners, who self-disclose a disability documented by a qualified professional and are eligible for accommodations under the provisions of Section 504 of the Americans with Disabilities Act (ADA), may be granted appropriate testing accommodations. Adult Education programs must document that adult learners were given the opportunity to self-disclose any disability during the student orientation process.

Assessments for special populations are administered with appropriate accommodations as specified by the test publisher of the approved assessment.

BEST Literacy

Laws such as the Americans with Disabilities Act of 1990 and other related federal, state, and local laws were enacted to guarantee equal opportunity for individuals with disabilities, including those in educational programs. Programs administering BEST Literacy are responsible for providing accessible services and for making sure that requests for accommodation are considered and handled in a manner consistent with applicable laws and regulations.

Program and test administrators may provide or allow accommodation in test administration procedures or in the testing environment for individuals with disabilities, provided that the accommodation does not compromise the purpose of the test as a measure of reading and writing in English. Permissible accommodations related to test administration procedures include the use of eyeglasses or magnifying glasses, earplugs, color overlays, or rulers. Testing environment accommodations might include frequent breaks or individual administration.

It is not an appropriate accommodation for someone to read the test questions to an examinee with sight impairment, as BEST Literacy is a test of reading (BEST Literacy Test Manual 2008 pgs. 9-10).

Additional information for the BEST Literacy assessment is available at
<http://www.cal.org/aea/pdfs/Frequently-Asked-Questions-CAL-Adult-ESL-Assessments.pdf>

BEST Plus
2.0

Accommodations in test administration procedures for BEST Plus 2.0 include using hearing aids, but do not include allowing students to read prompts from the computer screen. As BEST Plus 2.0 is not a timed test, no accommodation for testing time is needed. Furthermore, as an oral proficiency interview, students need to hear test prompts and respond orally as well as look at picture cue prompts; therefore, no accommodation can be made for students who cannot hear, speak or see (Center for Applied Linguistics 2008).

Comprehensive Adult Student Assessment System (CASAS)

Accommodations in test administration procedures for the CASAS Assessment are available at <https://www.casas.org/training-and-support/testing-guidelines/accommodations-guidelines>

Test of Adult Basic Education (TABE)

Accommodations in test administrations procedures for the TABE Assessment are available on the DRC website: [http://tabetest.com/PDFs/TABE Guidelines to Inclusive Testing 2017.pdf](http://tabetest.com/PDFs/TABE_Guidelines_to_Inclusive_Testing_2017.pdf)

Test for Adult Basic Education-Complete Language Assessment System-English (TABE CLAS-E)

TABE CLAS-E provides large-print editions to accommodate examinees with special needs:

- Large-Print Edition Locator Test
- Large-Print Edition Language Proficiency Tests, Forms A and B
- Expository Writing Folios are incorporated in Large-Print Edition Test Books.

Additional information may be found on the DRC website:

[http://tabetest.com/PDFs/TABE Guidelines to Inclusive Testing 2017.pdf](http://tabetest.com/PDFs/TABE_Guidelines_to_Inclusive_Testing_2017.pdf)

Accommodations for approved assessments may differ from accommodations for an approved high school equivalency test.

A. Contact the current test publisher for the appropriate accommodation process at:

<http://hiset.ets.org/requirements/disabilities/accommodations>

Although a student may receive accommodations for assessments for placement or to measure growth by a local program, this does not guarantee or imply that the same accommodations will be appropriate or provided for the approved high school equivalency test.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.108

Title: REPORTING INDICATORS OF
PERFORMANCE

Authority: Board Action	Original Adoption: 02/09/2011
	Effective Date: 02/09/2011
	Last Revision: 11/14/2012

National Reporting System (NRS) policies mandate that all local adult education programs must report indicators of performance. Measured skill gains (Educational gains) are calculated on all learners in the program year, July 1–June 30. The other indicators are collected on students who exit during specific time period each year. Indicators of Performance which must be reported include:

1. Measured Skill Gains that are in relation to the student's Educational Functioning Level (EFL) in reading, writing, speaking and listening, and functional areas. It is accomplished through making the gain on a pre/post-test comparison, attaining a high school diploma or the state recognized equivalency or *entering a postsecondary education of training program. This measure applies to all students;
2. *Students are tracked for Employment during the 2nd quarter after exit.
3. *Students are tracked for Employment in the 4th quarter after exit.
4. *The Median earnings of participants who are in unsubsidized employment during the second quarter after exit
5. *Receipt of a Secondary Credential or recognized equivalent during participation or within 1 year after exit from the program. The receipt of a secondary diploma is only counted if the participant also enters postsecondary education or training, or employment within 1 year after exit.
5. *Receipt of a recognized Postsecondary Credential during participation or within 1 year after exit from the program.

Programs must meet a minimum of 50 percent of the federally-approved indicators of performance as measured by NRS Tables 4 and 5 annually.

*Data-matching is used for these goals to measure program outcome.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.115

Title: LOCAL PROGRAM
ADMINISTRATION

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: 11/14/2012

The Adult Education and High School Equivalency Testing Program shall be administered by the Louisiana Community and Technical College System (LCTCS) and operated by eligible entities as stipulated in the authorizing federal legislation. The LCTCS shall certify adult education sites of instruction using procedures as approved by the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS).

Program Income

Program income is defined as “gross income received by the grantee or sub-grantee directly generated by a grant supported activity or earned as a result of the grant agreement during the grant period.” Program income is governed by the terms of the agreement between the state and local sub-grantee. Program income must be accounted for in program records and used only for costs allocable under Adult Education and Family Literacy Act (AEFLA). Program income may only be used to provide local adult education and literacy services. This can include the payment of salaries and purchase of materials.

In accordance with the Education Department General Administrative Regulations (EDGAR) at 2 C.F.R. §200.307 and 3 CFR 76.534, tuition monies and/or fees collected must be used for classes, coordination, supervision, and general administration of full- and part-time adult basic education programs, including responsibilities associated with the management of the finances of these programs.

Grant recipients shall:

- Notify WRU that program income will be collected during the fiscal year (including the proposed amount to be charged to students);
- Provide an income waiver process to eligible students. Fees charged to students participating in an adult education program must be equitably administered and must not reach levels that have an adverse effect on the participation of economically disadvantaged students;
- Complete and submit the Program Income Report Form(s) to LCTCS. If program income was collected during the fiscal year, a detail of all collections and expenditures by object code must be included in the annual submission.
- Program income must be spent on allowable costs under AEFLA and in accordance with EDGAR Requirements for *Use of Program Income* (2 C.F.R. § 200.307) and State requirements;
- Retain documentation and receipts for program income expenditures; and

- Expend collected program income funds before submitting reimbursement requests for awarded fiscal year funds.

Unless prior written approval is received from LCTCS, institutions of higher education and nonprofit research institutions must add program income to the federal award. For example, a recipient receives a WRU subgrant in the amount of \$30,000. The recipient receives program income in the amount of \$5,000. The recipient may request reimbursement for \$30,000, but is in effect running a \$35,000 program and must expend the \$5,000 of program income on allowable expenditures under the grant.

Program income must be used for the purposes and under the conditions of the WRU subgrant.

Program income will be monitored by LCTCS. Grant recipients not using program income in the appropriate and specified manner will receive written notification from LCTCS and may be subjected to an on-site review and/or corrective actions as LCTCS determines necessary.

Grant recipients will report program income once during the grant award year for review by the state. The Program Income Report will be due at the end of the fourth quarter of the grant cycle. Certification of no program income is also due by the due date from any locality not collecting program income. Information about collecting and reporting program income will be included in all technical-assistance training related to grant reimbursements throughout the year. Program income will be monitored by LCTCS during collection times. Grant recipients not using program income in the appropriate and specified manner will receive written notification from LCTCS and may be subject to an on-site review. The Program Income Report form is available on the LCTCS website.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.119

Title: REQUIREMENTS FOR HIGH SCHOOL
EQUIVALENCY RETESTING

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: Initial

A test candidate may not retest before 30 days have elapsed since the student last tested. Retesting shall be performed on alternate forms of the tests within a calendar year. No form may be used a second time within a calendar year.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 1.120

Title: ISSUANCE OF EQUIVALENCY DIPLOMAS

Authority: Board Action	Original Adoption:	02/09/2011
	Effective Date:	02/09/2011
	Last Revision:	Initial

A high school equivalency diploma will be issued from the Louisiana Community and Technical College System (LCTCS) after the student has successfully completed an approved high school equivalency test or the portfolio review process demonstrating evidence of college-level career class proficiency and basic skills attainment by meeting the requirements for educational attainment through LCTCS WorkReady U Policy 1.118.

An official copy of results of high school equivalency tests administered to a Louisiana citizen/resident as well as an official copy of results of high school equivalency tests administered in the State of Louisiana shall be submitted by the high school equivalency testing company to LCTCS no later than 30 days following the calculation of test results.

A Louisiana resident who successfully completes an approved high school equivalency test at an official out-of-state testing center may be entitled to receive an equivalency diploma, provided that an official copy of the high school equivalency test results are submitted for review to the LCTCS and provided that the student meets all other qualifications to receive an equivalency diploma.

To be eligible for an equivalency diploma based on results of an approved high school equivalency test, a veteran or member of the Armed Forces shall be a legal resident of Louisiana for six consecutive months or shall have formerly attended a Louisiana school.

A student who has earned a Louisiana High School Equivalency Diploma issued by the LCTCS is considered a Louisiana high school graduate in every respect.

Louisiana high school equivalency diplomas shall be signed by the President of the Louisiana Community and Technical College Systems and the Board Chair of the Board of Supervisors of the Louisiana Community and Technical College System.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM

Policy #1.107

THIS POLICY IS NO LONGER NEEDED. THE ITEMS have changed with WIOA and ARE COVERED IN POLICY 1.108 AND 1.111

Title: NATIONAL REPORTING SYSTEM (NRS) CORE AND SECONDARY MEASURES

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: Initial

NRS measures include both core measures and secondary measures. NRS core measures apply to all adult education students. There are three types of core measures:

1. outcome measures, which include:
 - a. educational gain;
 - b. entered employment;
 - c. retained employment;
 - d. receipt of secondary school diploma or GED; and
 - e. placement in postsecondary education or training;
2. descriptive measures, including:
 - a. student demographics;
 - b. reasons for attending and student status; and
3. participation measures of contact hours received and enrollment in instructional programs for special populations or topics (such as family literacy, corrections or workplace literacy).

NRS secondary measures include additional outcome measures related to employment, family and community that adult education stakeholders believe are important to understanding and evaluating adult education programs.

Programs must meet a minimum of 50 percent of the federally-approved performance benchmarks as measured by NRS Tables 4 and 5 annually.

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM

Policy # 1.109

NO LONGER REQUIRED BY NRS (National Reporting System for Adult Education)

Title: STUDENT GOAL SETTING AND CORE MEASURES

Authority: Board Action

Original Adoption: 02/09/2011

Effective Date: 02/09/2011

Last Revision: 11/14/2012

Adult learners enter adult education programs for any number of reasons, which are reflective of the students' educational, vocational, and personal goals. The goal setting process occurs at intake and is intended to define the areas to focus instruction and learning.

National Reporting System requires states to automatically report the follow up measures for all students who meet certain criteria. Follow up measures for each student shall be determined at intake by the criteria listed below and entered in the statewide data management system. For NRS reporting purposes, the data system will automatically designate the cohort for each applicable follow up measure.

Follow Up Measure	Criteria
Enter Employment	Learners who are not employed at time of entry <i>and in the labor force</i> who exit during the program year.
Retain Employment	Learners who, at time of entry, were not employed <i>and in the labor force</i> , who are employed in the first quarter after exit quarter, and learners employed at entry.
Receipt of a Secondary Credential	All enrolled learners <i>who take all GED tests, or are enrolled in adult high school at the high ASE level, or are enrolled in the assessment phase of the External Diploma Program (EDP)</i> who exit during the program year.
Enter Post-Secondary or Training	All learners <i>who passed the GED tests or earned a secondary credential while enrolled in adult education, or have a secondary credential at entry, or are enrolled in a class specifically designed for transition to postsecondary education</i> who exit during the program year. A transition class is a class that has a specific purpose to prepare students for entry into postsecondary education, training or an apprenticeship program.

Instructional goals should be reviewed upon reassessment of the student and updated accordingly. It is the role of the adult education instructor or coordinator to provide students with guidance on how to set and work toward meeting learning goals. Adult education instructors and coordinators will discuss with students the time frame to meet goals and discuss accessible resources for working toward the goal.